

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

**Kanye West, Michelle Tidball,
and Fred Krumberger,**

Court File No. 20-CV-1348-WCG

Plaintiffs,

v.

**DECLARATION OF
LANE RUHLAND**

Wisconsin Elections Commission,

Defendant.

I, Lane Ruhland, being duly sworn, declares as follows:

1. I have personal knowledge of the following.
2. I have been a licensed attorney for seven years and am employed as Senior Counsel at the law firm Husch Blackwell in Madison, Wisconsin.
3. On August 4, 2020, I spoke via phone with Wisconsin Election Commission staff on matters related to Mr. West's nominating papers. To the best of my knowledge Commission staff members I was speaking to were located at the Commission's office located at 212 East Washington Avenue, Madison, Wisconsin.
4. During these phone conversations, Election Commission staff alerted me that the doors to the building housing the Election Commission offices at 212 East Washington Avenue – would be locked and I would need to be escorted in.
5. The Commission brought to my attention that when the nominating paper coordinators and I arrived at the building housing the Commission's offices, I would need

to call the number on the door so that a Commission official could meet me to unlock the doors and let me in. No Commission staff member told me that the number to call at the door was different than the Commission number I had been calling throughout the day of August 4th.

6. I and the other two nomination petition coordinators with me arrived at the Commission building before 5:00 p.m.

7. Before 5:00 p.m. I approached the double doors and, following the instructions from Commission officials, searched for the number on the building doors and called telling them we were at the building.

8. While I was looking for the number to call on the doors of the building, I did not see anyone positioned near the locked doors to provide myself or anyone from the West campaign access to the building, nor did I have any indication that anyone would be waiting there.

9. Before 5:00p.m. I called the number on the outside of the building.

10. Before 5:00 p.m. I entered the building with a nomination petition coordinator.

11. Election Commission officials accepted the West nominating papers not later than 5:00 p.m. Only later did Election Commission officials announce that the Commission's acceptance occurred at 5:00:14 p.m.

12. When the nominating papers were accepted no Election Commission official noted the time to me or the nomination petition coordinator who was in my

presence. There was no evidence of what timing device was relied upon to later announce the nominating papers acceptance took place at 5:00.14 p.m.

13. The Election Specialist, who unlocked the building, did not identify how he knew the time, what timepiece he was using, or identify anyone authorized to keep time for the Commission.

14. To the best of my knowledge, I did not view any time stamp or other document that verified the acceptance of the nominating papers of Kayne West as an independent candidate for president and his vice-presidential running mate Michelle Tidball, occurred at 5:00:14 p.m.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 2, 2020

/s/Lane Ruhland
Lane Ruhland